

January 20, 2004

VIA HAND DELIVERY

Mr. Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

RE: Southeast Telephone, Inc.
Case No. 2003-00115

RECEIVED

JAN 20 2004

Dear Mr. Dorman:

Enclosed for filing please find an original and eleven (11) copies of the Joint Motion for Continuance for Southeast Telephone Company and Kentucky ALLTEL in the above-referenced case.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to call.

Sincerely,

WYATT, TARRANT & COMBS, LLP



Stephanie R. Conn

Legal Secretary to James H. Newberry, Jr.

Enclosures

Joint Motion (original and eleven copies)
cc: Jonathon N. Amlung, Esq. (w/enclosures)
Steve Rowell, Esq. (w/enclosures)

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JAN 20 2004
PUBLIC SERVICE
COMMISSION

**Petition of Southeast Telephone, Inc., for)
Arbitration of Certain Terms and)
Conditions of the Proposed Agreement with)
Kentucky ALLTEL, Inc., Pursuant to the)
Communications Act of 1934, as amended)
by the Telecommunications Act of 1996)**

Docket No. 2003-00115

JOINT MOTION FOR CONTINUANCE

Southeast Telephone Company ("Southeast") and Kentucky ALLTEL, Inc. ("ALLTEL") state as follows for their Joint Motion for Continuance with respect to the deadline to file an interconnection agreement:

1. By Order dated December 19, 2003, (the "Arbitration Order") the Commission directed the parties to file an interconnection agreement consistent with the Arbitration Order.

2. Without waiving any rights to appeal and under protest, ALLTEL provided Southeast an interconnection agreement, which it believes is consistent with the Arbitration Order and the parties have participated in several telephone conferences with respect to the Agreement and have resolved language on all except two issues.

3. As the order does not address these issues, the parties do not anticipate being able to resolve language with respect to those two issues without further legal and perhaps factual determinations by the Commission.

4. The parties hereby request that the deadline to file the agreement be suspended and that the parties be allowed to file on Friday, January 23, 2004, a description of the two issues and the parties' respective legal arguments with respect to

those issues. The parties propose to file the agreement within two days following resolution of these two issues.

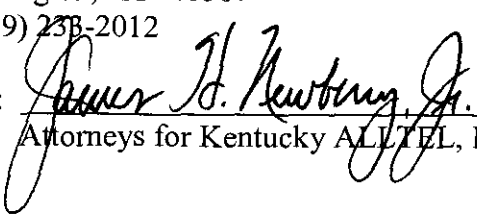
5. ALLTEL expressly reserves and does not waive any rights to further proceedings as may be necessary with respect to any factual determinations that may be occasioned by or necessary to resolve the issues to be presented in the January 23, 2004, filings by the parties.

6. Mr. Jonathon Amlung, Counsel for Southeast has authorized Steven Rowell, co-counsel for ALLTEL, to represent that Southeast joins in this motion.

Wherefore the parties move for a continuance of the deadline for filing of the interconnection agreement to allow the parties to file their description and statements of legal positions on the two unresolved issues by Friday, January 23, 2004, and to then file the interconnection agreement within two days following the determination.

Respectfully submitted,

James H. Newberry, Jr., Esq.
Noelle M. Holiday, Esq.
Wyatt, Tarrant & Combs, LLP
250 West Main Street, Suite 1600
Lexington, KY 40507
(859) 238-2012

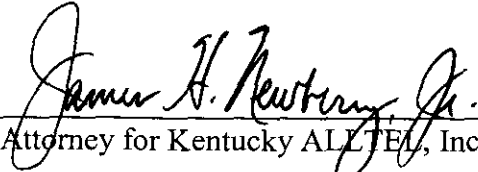
By: 
Attorneys for Kentucky ALLTEL, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion for Continuation was served upon SouthEast Telephone, Inc. by mailing a copy of same to:

Jonathon N. Amlung, Esq.
Attorney for Petitioner
1000 Republic Building
429 W. Muhammad Ali Blvd.
Louisville, KY 40202

This the 20th day of January, 2004.


Attorney for Kentucky ALLTEL, Inc.

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